



---

NPB Public Notice # 15: Comments Submitted By the State Educational Technology Directors Association (SETDA) - GN Docket Nos. 09-47, 09-51, 09-137; CC Docket No. 02-6; and WC; Docket No. 05-195

November 19, 2009

Dear Commissioner:

Thank you for the opportunity to reinforce and comment on the essential need for robust broadband access for our nation's public elementary and secondary schools. The State Educational Technology Directors Association (SETDA) was founded in 2001 to provide national leadership on behalf of state and territorial department of education leaders charged with driving innovation in education through broadband and technology. We represent all 50 states, the District of Columbia, American Samoa, the US Virgin Islands, and the Bureau of Indian Affairs schools. We firmly believe that all students, no matter their background or location – and especially those at-risk – benefit from access to the information and tools enabled by robust broadband at the school-, district-, and state-levels. Without a strong and renewed federal commitment to such access through the national broadband plan, we put at risk the dramatic reform efforts underway to fundamentally reshape our education system to better equip all of our students for life, work, and citizenship in the 21<sup>st</sup> century. Nothing less than our future economic well-being and democratic ideals are at risk.

Robust broadband access across the education system and at scale is essential to creating an ecosystem of innovation that the government and private sector can employ to realize operational efficiencies and build new and more effective learning environments. These learning environments better support educators, engage and empower students to succeed, and provide more and better information to drive continuous improvement in schools. State and local level leaders and educators have the ability to be more creative in policy and practice when there is a broadband infrastructure that allows for:

- Innovative teaching approaches that better meet student needs and circumstances, such as online and blended learning, collaborative learning projects, and access to authentic audiences and experts;
- Large-scale online formative and summative assessments and real-time data to individualize instruction and inform policymaking;
- Access to digital and open content, including high-quality, standards-aligned video, audio, text, and interactive simulations;
- Increased and meaningful exposure to the full-range of STEM fields;
- Peer coaching and educator professional development through video conferencing, courseware, and collaboration tools; and
- Robust courseware and virtual access to high-quality teachers for students in rural or other settings otherwise unable to access advanced math, science and foreign language opportunities.

Currently, governments and educational software and content providers are overly constrained in developing and deploying the broadband-enabled products and services needed by all schools. In effect, we are forced to the lowest common denominator with highly variable and inadequate bandwidth. Where there is adequate bandwidth locally,

innovation and teacher creativity is stifled before it can flourish. New approaches wither before they can go to scale due to frustrating interactions with inadequate technology infrastructure.

We recommend streamlining the eRate application process and increasing the level of funding to ensure all Priority I activities are realized. We also urge the FCC to collaborate with other federal agencies - including the White House Office of Science and Technology Policy, OMB, the U.S. Departments of Education, Labor, Commerce, Justice, the NSF, and others – to ensure guidance and rules are coordinated and reasonable, that more meaningful accountability systems are established, and that decisions about educational need and quality are left to the most appropriate parties. State departments of education are in the best position to ensure meaningful educational innovations for all students are brought to scale. Such collaboration should yield:

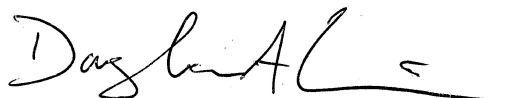
- Coordinated federal-state education leadership initiatives emphasizing the foundational role of technology in driving innovation in schools to address the four priority areas (i.e., assurances) set forth by the Administration;
- A renewed federal advanced learning technologies research and development agenda focused on pre-competitive ideas and tools with broad application to the longstanding educational needs of public elementary and secondary schools;
- A strong, dedicated federal educational technology investment that offers states the opportunity to deploy research-based best practices at scale to address individual student and teacher needs through innovative approaches and learning environments;
- A balanced regime to Internet safety and security issues that do not overly limit the educational potential of new tools and devices – and ensure students and teachers are provided the knowledge and skills they need to make good choices with new media and tools; and,
- Data systems that address school and classroom needs and support individualized instruction, in addition to meeting accountability and compliance requirements.

We submit as an addendum to this letter the following documents and program examples, which are illustrative of the types of innovations enabled by sustained investments in broadband infrastructure for schools highlighted in SETDA's *Joint Paper with Title I* at <http://www.setda.org/web/guest/titleI>, and *ARRA Assurances Paper* at [http://www.setda.org/c/document\\_library/get\\_file?folderId=281&name=DLFE-425.pdf](http://www.setda.org/c/document_library/get_file?folderId=281&name=DLFE-425.pdf) as well as SETDA's *Class of 2020 Action Plan for Education* found at:

- [Broadband Access for All Kids: Breaking through the Barriers](#)
- [Science, Technology, Engineering, and Mathematics](#)
- [Technology-Based Assessments Improve Teaching and Learning](#)
- [Empowering Teachers: A Professional and Collaborative Approach](#)
- [Learning Virtually: Expanding Opportunities](#)

Please don't hesitate to contact me with questions at 410-972-1271 or [dlevin@setda.org](mailto:dlevin@setda.org).

Sincerely,



Douglas A. Levin

SETDA, Executive Director